

Governor

JOHN A. SANCHEZ

Lt. Governor

# NEW MEXICO ENVIRONMENT DEPARTMENT

Harold Runnels Building 1190 South St. Francis Drive (87505) P.O. Box 5469, Santa Fe, NM 87502-5469 Phone (505) 827-0187 Fax (505) 827-0160 www.env.nm.gov



BUTCH TONGATE Cabinet Secretary-Designate J. C. BORREGO Deputy Secretary

#### Certified Mail - Return Receipt Requested

February 21, 2017

Mr. Alex C. Brown, Town Manager P.O. Box 1188 Silver City, New Mexico 88062

**Re:** Silver City Waste Water Treatment Facility, MSGP, SIC 4952, NPDES Compliance Evaluation Inspection, NMR053019, January 19, 2017

Dear Mr.Brown:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

NPDES Enforcement Coordinator Environmental Protection Agency, Region 6 NPDES Enforcement Branch (6EN-WM) 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733 Program Manager New Mexico Environment Department Surface Water Quality Bureau (N2050) Point Source Regulation Section P.O. Box 5469 Santa Fe, New Mexico 87502 Silver City WWTP, NMR053019 January 19, 2017 Page 2 of 2

David Long is USEPA Region 6's Acting NPDES Enforcement Coordinator at the above address. If you have any questions about this inspection report, please contact Jennifer Foote at 505-827-0596 or at Jennifer.Foote@state.nm.us.

Sincerely,

/s/ Sarah Holcomb

Sarah Holcomb Acting Program Manager Point Source Regulation Section Surface Water Quality Bureau

cc: Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail David Long, USEPA (6EN-WM) by e-mail Robert Houston, USEPA (6EN)
Darlene Whittten-Hill, USEPA (6EN) by e-mail Michael Kesler, NMED District III by e-mail Manny Orosco, Town of Silver City, by e-mail

Form Approved OMB No. 2040-0003 Approval Expires 7-31-85



#### **NPDES Compliance Inspection Report**

												Sect	ion A:	Natio	onal D	ata S	System	Codir	ng										
	Trans	action	1 Code							NPDI	ES							yr/mo/day Ins				spec. T	ype	In	specto	or	Fac Type		
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													Se	ection	B: Fa	cility	/ Data												
Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)  SILVER CITY WASTEWATER TREATMENT PLANT:							lude		Entry Time /Date 8:10 am Jan 19, 2017					Permit Effective Date September 1, 2013															
1660	) FII		EE RO						NM 88		:							Exit Time/Date 1:10 pm Jan 19, 2017					Permit Expiration Date August 31, 2018						
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									one and								Τ						N:	32° 42					
MR. ALEX C. BROWN, TOWN MANAGER (575) 534-6358 P.O. BOX 1188 SILVER CITY, NM 88062  W -108° 14' 47"  SIC 4952																													
									(	S = Sa								Inspectory, N		Evalua	ited)								
M	Per	nit					1	N	Flow	Measu	remen	t			S	O	perati	ons &	Maint	enanc	e		N	cso	/SSO				
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See	attac	ehed s	heets f	or fu	urther	· detai	ls.																						
Name(s) and Signature(s) of Inspector(s)				Agency/Office/Telephone/Fax						Dat	e																		
Jenn	ifer I	oote	/s/	Jen	nifer l	Foote						NM	AED/S	WQB	505-8	827-0	596							2/1	6/17				
Sign	atur	e of M	lanage	men	t QA	Revie	wer											Numbe	ers					Date					
Sarah Holcomb, Acting Program Manager /s/ Sarah Holcomb				NMED/SWQB 505-827-2798						2/21	l/ <b>17</b>																		

EPA Form 3560-3 (Rev. 9-94) Previous editions are obsolete.

<u>National</u>	Database Information		<u>General</u>	
Inspection Type	Compliance Eva	luation	Inspector Name	Jennifer Foote
NPDES ID Number	NMR05301	9	Telephone	505-827-0596
Inspection Date	1/19/17		Entry Time	8:10 am
Inspector Type (circle one)	□EPA ⊠State	□EPA Oversight	Exit Time	1:10PM
Facility Sector/ SIC/Activity Code			Signature	/s/ Jennifer Foote

Facility Location Information													
Name/Location/ Mailing Address	SILVER CITY WASTEWATER TREATMENT PLANT 1660 FILAREE ROAD, SILVER CITY, NM 88061												
GPS Coordinates	Latitude	32.71393	Longitude	-108.249009									
Receiving Water(s) San Vicente Arroyo (Segment No.20.6.4.099), a tributary to the Mimbres River													

Contact Information										
	Name(s)	Telephone								
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Alex C. Brown, Town Manager	(575) 534-6358								
Facility Contact	Manny Orosco	(575) 388-4981								
Authorized Official(s)	Alex C. Brown	(575) 534-6358								

Basic Permit	<u>Information</u>	Basic SWPPP Informa	ation		
Permit Coverage	⊠Y	□N	SWPPP Prepared & Available	⊠Y	□N
Permit Type	☐ General	⊠ Individual	SWPPP Contents Satisfactory	ΠΥ	⊠N
Operational Date	1989		SWPPP Implementation Satisfactory	ΠΥ	⊠N
NOI/Application Date	9/5/2015		SWPPP Date	June 8, 20	010
If applicable, is no exposure certification on file?	□Ү	⊠N □N/A			

SWPPP Review			
<u>General</u>			Notes:
Was the SWPPP completed prior to NOI submission?	⊠ Y	□ N	SWPPP has not been updated to new permit. Only amendment in amendment log was 2/10/2011 to the site maps.
Copy of the NOI and acknowledgment letter from EPA?	□ Y	⊠ N	Facility still had 2011 NOI referenced. Inspector found a 2015 permit number online that appears to be for this facility but is not linked to the previous permit or the individual permit in ECHO. Facility had no documentation for new permit.
Copy of the permit language?	□ <b>Y</b>	⊠ N	SWPPP has not been updated to new permit
Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires?	× Y	□ <b>Z</b>	
Does the SWPPP contain a signed/certified statement indicating that the site is inactive and unstaffed, and that there are no industrial materials or activities exposed to precipitation, in accordance with the substantive requirements in 40 CFR 122.26(g)(4)(iii)?  Applicable to:  Routine facility inspection (4.1.3)  Quarterly visual assessment (4.2.3)  Benchmark monitoring (6.2.1.3).	□ Y	Z	N/A
Does the SWPPP include copies of relevant parts of other documents (e.g., SPCC) referenced in the SWPPP?	Y	□ N	N/A
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	× Y	□ N	
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	× Y	□ N	
Does the SWPPP include documentation to support eligibility under NEPA (New Source)?	Y	□ <b>N</b>	N/A
Did all "operators" sign/certify the SWPPP?	⊠ Y	□ N	SWPPP signed 7/6/2010 by Town Manager
Is the storm water pollution prevention team identified (name or title)?	× Y	□ N	
Are the storm water pollution prevention team's responsibilities identified?	× Y	<b>□ Z</b>	

Site Description			Notes:
SWPPP provides a description of the facility's industrial activities?	× Y	□ <b>N</b>	
Is there a general location map (e.g., USGS quadrangle map) with enough detail to identify the location of the facility and all receiving waters for storm water discharges?	× Y	□ <b>N</b>	
Is there a site specific site map?	× Y	□ <b>N</b>	
Does the site map contain the size of the property in acres?	□ Y	×	
Does the site map contain the location and extent of significant structures and impervious surfaces?	× Y	□ N	
Does the site map contain directions of storm water flow (indicated by arrows)?	□ Y	×	Shows flow patterns with proposed berm that has not been built.
Does the site map contain locations of all existing structural control measures?	☐ <b>Y</b>	⊠ N	Shows proposed berm that has not been built.
Does the site map contain locations of all receiving waters in the immediate vicinity of the facility, indicating if any of the waters are impaired, and if so, whether the waters have TMDLs established for them?	× Y	□ <b>N</b>	
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	Y	⊠ N	Missing location of culvert with run-on from entrance road area. Shows diversion berm that was not built.
Does the site map contain locations of all potential pollutants and significant materials identified under Part 5.1.3.2?	× Y	□ N	
Does the site map contain locations where significant spills or leaks identified under Part 5.1.3.3 have occurred?	Y	□ <b>N</b>	N/A. SWPPP reports no significant spills or leaks have occurred.
Does the site map contain locations of all storm water monitoring points?	×	□ <b>Z</b>	Shows location of location monitored. However, stormwater does not actually leave the site there due to a retention pond.
Does the site map contain locations of storm water inlets and outfalls, with a unique identification (e.g., 001, 002) for each outfall and if substantially identical?	<b>~</b>	⊠ N	Map indicates a diversion berm that was never built downhill of drying beds, stormwater leaves the site to the west of the drying beds via sheet flow, not at Outfall#2.
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	Y	□ N	N/A
Does the site map contain locations and descriptions of all non-storm water discharges?	Y	⊠ N	Location of Outfall #1 (NPDES permit NM0020109) not on map. SWPPP certifies no unpermitted non-storm water discharges.

Site Description			Notes:
Does the site map contain locations of the following activities where these activities are exposed to precipitation?	Y	□ N	
Fueling stations			
Vehicle and equipment maintenance and/or cleaning areas			
<ul> <li>Loading/unloading areas</li> </ul>			
<ul> <li>Locations used for the treatment, storage or disposal of wastes</li> </ul>			
Liquid storage tanks			
<ul> <li>Processing and storage areas</li> </ul>			
<ul> <li>Immediate access roads and rail lines used or travelled by carriers of raw materials, manufactured products, waste materials, or by- products used or created by the facility</li> </ul>			
Transfer areas for substances in bulk			
Machinery			
Does the site map contain locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants?	□ Y	□ N	N/A
Does the SWPPP document areas at the facility where industrial materials or activities are exposed to storm water and from which allowable non-storm water discharges are released?	□ Y	□ N	N/A
Does the SWPPP include a list of the industrial activities exposed to storm water (e.g., material storage; equipment fueling, maintenance, and cleaning; cutting steel beams)?	× Y	□ N	
Does the SWPPP include a list of pollutants and/or pollutant constituents associated with each identified activity?	× Y	□ N	
Does the SWPPP include documentation of where spills and leaks occurred for three years prior to the preparation of the SWPPP?	□ Y	□ Z	N/A. SWPPP reports no significant spills or leaks have occurred.

Site Description			Notes:
Does the SWPPP include a non-storm water discharge evaluation in the SWPPP? Does it include:  Date  Description of evaluation criteria  List of the outfalls or onsite drainage points directly observed  Different types of non-storm water discharges and source locations  Actions taken such as a list of control measures for elimination.	× Y	□ N	SWPPP contains statement that no non-storm water discharges have occurred.  Quarterly inspections also include a check for non-stormwater and a certification statement.
Does salt storage occur at this facility?	Y	⊠ N	
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	Y	⊠ N	
Controls to Reduce Pollutants			Notes:
Does the SWPPP include documentation of the location and type of control measures at the facility to comply with the requirements in Part 2?	⊠ Y	□ N	Berms and retention pond will be used. However, berm to west of drying beds was never installed.
Does the SWPPP include documentation that selection and design of control measures were based on a consideration of the practices and procedures in Part 2.1.1?	× Y	□ N	Use of berms to prevent run-on, retention pond to retain onsite stormwater and berms to prevent discharge of stormwater.
Does the SWPPP include measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings?	× Y	□ N	Stormwater from drying beds is sent to influent.
Does the SWPPP include good housekeeping measures (e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)?	⊠ Y	□ N	SWPPP describes training and practices to keep site orderly and clean.

Controls to Reduce Pollutants			Notes:
Does the SWPPP include a schedule for pickup and disposal of wastes and routine inspections of tanks and drums?	Y	⊠ N	
Does the SWPPP include preventative maintenance procedures, including regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line?	× Y	□ N	
Does the SWPPP include a schedule for preventative maintenance procedures?	Y	⊠ N	
Does the SWPPP include procedures for minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur?	×	N	
Does the facility implement procedures for plainly labeling containers (e.g., "Used Oil," "Spent Solvents," "Fertilizers and Pesticides," etc.) that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur?	Y	⊠ N	AST fuel tanks not labeled "empty". There also appears to be a diesel UST at the facility(photo 5).
Does the facility implement preventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling?	Y	□ N	N/A
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	× Y	□ N	
Does the facility train employees who may cause, detect, or respond to a spill or leak in these procedures and have necessary spill response equipment available?	× Y	N	Training program in place with supporting documentation.
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	× Y	□ N	

Controls to Reduce Pollutants			Notes:
Does the SWPPP document erosion and sediment controls?	⊠ Y	□ N	
Does the facility stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, and the resulting discharge of pollutants?	× Y	□ Z	Several areas of the site have been stabilized with gravel, retention pond on North east prevents discharge. However, south east portion of site is bare and does not have a berm installed to prevent runoff.
Does the facility place flow velocity dissipation devices at discharge locations and within outfall channels where necessary to reduce erosion and/or settle out pollutants?	Y	□ N	N/A
If the facility stores salt at this facility, are the piles enclosed or covered? Does the facility implement appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile?	Y	□ <b>N</b>	N/A
Employee Training – is there a schedule for regular (at least annually) employee training?	□ Y	× N	Training records in plan indicate training occurred on 5/13/2010 and 9/21/2012.
Does training cover both the specific control measures used to achieve the effluent limits in Part 2 and monitoring, inspection, planning, reporting, and documentation requirements in other parts of the permit?	× Y	□ N	Site training includes stormwater control and maintenance of BMP's.
Does the facility ensure that waste, garbage, and floatable debris are not discharged to receiving waters by keeping exposed areas free of such materials or by intercepting them before they are discharged?	× Y	□ Z	New covered waste containers onsite.
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	× Y	□ N	
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	× Y	□ N	

Notes on SWPPP Review
Site Description:
The Silver City Wastewater Treatment Plant (WWTP) is 13 acres, the site slopes from west to east. The north and northeast side of the facility is bermed to prevent the San Vicente from flooding onto the plant grounds. There is a retention pond on the northeast side, with no visible outlet. There are storm drains that bring water from the entrance road to an asphalt area in between the drying beds that leaves the site as sheet flow through a bare soil area. The septage receiving area has been stabilized with gravel. Except for the entrance driveway, the surrounding area is undeveloped vegetated grass/shrub.
The SWPPP map shows a "proposed berm" on the southeast side that was never installed. Currently water (and potentially pollutants) from the sludge bed area and septage receiving leave the site without BMPS from this area. (photo 6) There is no way to sample runoff from the sheet flow discharge from this area.

Ins	Inspections (Part 4)					
	General Notes:					
Ro	utine Facility Inspections					
	e routine facility inspections conducted at state of the	Y	⊠ N	Inspection conducted annually		
Are •	e inspections documented, including: Date and time Name and signature of inspector Weather information and a description of discharge occurring at the time of the inspection Previously unidentified discharges from site Control measures needing maintenance or repairs Failed control measures that need	×	<b>Z</b>			
• •	replacement Incidents of noncompliance observed Additional control measures needed. ceptions, including (see 4.1.3):		]			
•	Inactive and unstaffed sites	□ >	$\square$ z	N/A		
Qu	arterly Visual Assessment					
Are quarterly visual assessments conducted?		⊠ Y	<b>Z</b>			
Does the assessment consist of a sample collected:						
•	Within the first 30 minutes of discharge On discharges that occur at least 72 hours (3 days) from the previous discharge Collected in a clean, clear glass or plastic container.	× Y	$\square$ Z			

Ins	Inspections					
Are	e assessments documented, including:					
•	Sample location					
•	Sample collection date/time & visual assessment date/time			Sample is taken from detention pond (shown as outfall 002 on site map, though discharges do not leave pond).		
•	Personnel collecting sample & performing assessment and their signature			No documentation of when event began or if sample was collected in 1 <sup>st</sup> 30 min on form.		
•	Nature of the discharge (runoff or snowmelt)	⊠ Y	□ <b>Z</b>			
•	Results of observations (including color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen and other obvious indicators)					
•	Probable sources of contamination					
•	If applicable, reason for not taking samples within 1 <sup>st</sup> 30 minutes.					
Exceptions, including (see 4.2.3):				Stormwater is examined only at "outfall #2".		
•	Adverse weather conditions			Stormwater actually leaves the site along an unburmed		
•	Climates with irregular storm water runoff			area downhill of the sludge drying beds and vegetated staging area.		
•	Areas subject to snow			staging area.		
•	Substantially identical outfalls (per 5.1.5.2)	Υ	N			
•	Inactive and unstaffed sites.					
Co	mprehensive Site Inspections					
Are comprehensive site inspections conducted annually (start 9/29/08)?		⊠ Y	□ <b>N</b>			
Conducted by qualified personnel including at least one member of the storm water pollution prevention team?		×	<b>Z</b>			
Cover all areas of the facility?		$\boxtimes$				
		Υ	N			
Include a review of monitoring data? Do inspectors consider the results of the past year's visual and analytical monitoring when planning and conducting inspections?		Y	× N			

Inspections				
Include observations of the following:				
<ul> <li>Industrial materials, residue, or trash that may have or could come into contact with storm water</li> </ul>			Not specified on form, but include sector specific items from Part 8.T.6 of the permit: Include the following areas in all inspections: access roads and rail lines; grit, screenings, and other solids handling, storage, or	
<ul> <li>Leaks or spills from industrial equipment, drums, tanks, and other containers</li> </ul>			disposal areas; sludge drying beds; dried sludge piles; compost piles; and septage or hauled waste receiving	
<ul> <li>Offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site</li> </ul>	⊠ Y	□ <b>Z</b>	station.	
<ul> <li>Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas</li> </ul>				
Control measures needing replacement, maintenance, or repair				
<ul> <li>All storm water control measures observed.</li> </ul>				
Are inspections documented, including:				
Date of inspection			Signed by inspector not authorized signatory	
Names and titles of personnel making the inspection				
<ul> <li>Findings from examination of areas of facility from Part 4.3.1</li> </ul>				
<ul> <li>All observations relating to implementation of control measures</li> </ul>	□ Y	⊠ N		
<ul> <li>Any required revisions to the SWPPP resulting from inspection</li> </ul>	ı	14		
Any incidents of noncompliance identified OR certification that facility is in compliance with the permit				
A statement signed in accordance with Appendix B, Subsection 11				

Monitoring (Part 6)					
General			Notes:		
Does the SWPPP contain a procedure for conducting sector (and co-located) specific benchmark monitoring?	Y	<b>N</b>	N/A		
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	□ Y	□ <b>N</b>	N/A		
Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required)	□ Y	□ <b>N</b>	N/A		
Are samples analyzed in accordance with 40 CFR Part 136 methods?		Z	N/A		
Benchmark Monitoring					
Does the monitoring consist of a sample collected:  Within the first 30 minutes of discharge  On discharges that occur at least 72 hours (3 days) from the previous discharge  Document the date and duration (in hours) of the rainfall event, rainfall total (snow - date only) for that rainfall  Prior to commingling.		Z	N/A		
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?		N	N/A		
Is the average of the first four quarterly samples < the parameter benchmark?		N	N/A		

Мо	Monitoring				
	the average of the first four quarterly mples > the parameter benchmark?  Make the necessary modifications  Continue quarterly monitoring  Determine and document that no further pollutant reductions are technologically available and economically practicable	Y	Z	N/A	
•	and achievable, continue monitoring once per year, notify EPA  Natural background pollutant level documentation				
Ex	ceptions, including (see 6.1 & 6.2):	$\vdash \vdash$			
•	Adverse weather conditions	'			
•	Climates with irregular storm water runoff			N/A	
•	Snowmelt	Υ	N	N/A	
•	Substantially identical outfalls (per 5.1.5.2)				
•	Inactive and unstaffed sites.				
Effluent Limitations Monitoring		<u> </u>	ļ!		
	mpled once per year?	Y	□ N	N/A	
Follow-up requirements if discharge exceeds effluent limit (see 6.3)?		Y	□ <b>N</b>	N/A	
Other Required Monitoring					
•	State or Tribal provisions				
•	Discharges to impaired waters	Y	N	N/A	
•	Additional monitoring required by EPA.	<u> </u>	<u> </u>		
Re	porting (Part 7)				
	<u>General</u>			Notes:	
Is monitoring data reported to EPA within 30 days of receiving analytical results for the monitoring period?		Y	□ N	N/A	
Is the annual report submitted by 45 days after conducting the comprehensive site inspection?		Y	⊠ N	Facility has been unable to report since 2008 permit expired. 2015 NOI was submitted, but facility was not aware of the new number and was having difficulty registering in CDX to input reports.	
If follow-up effluent limitations monitoring results exceed numeric limits, was a report submitted to EPA no later than 30 days after results were received?		Y	□ <b>N</b>	N/A	

SWPPP Implementation	n
Measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations)	(e.g., use grading, berming, or curbing to prevent runoff of contaminated flows and divert run-on away; locate materials, equipment, and activities so that leaks are contained in existing containment and diversion systems; clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants; use drip pans and absorbents under or around leaky vehicles and equipment or store indoors where feasible; use spill/overflow protection equipment; drain fluids from equipment and vehicles prior to on-site storage or disposal; perform all cleaning operations indoors, under cover, or in bermed areas that prevent runoff and run-on and also that capture any overspray; and ensure that all washwater drains to a proper collection system)
fueling operations) to rain, snow, snowmelt, and runoff	All processing of raw materials, loading and unloading, and equipment fueling are done outdoors. Sludge drying beds open to rainwater, but sloped towards drains. Collection system for trapping and containing stormwater not completed downhill of sludge beds, sampling discharge point not fully functional.
Good Housekeeping	(e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)
	Areas appear orderly, though some sludge has overtopped the drying beds on the south side (photo 4).
Preventative maintenance	(e.g., regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line)
	Repairs and preventative maintenance addressed in SWPPP. Logbook kept for daily repairs and maintenance performed.

SWPPP Implementation					
Spill Prevention and Response	(e.g., minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur)				
	Spill procedures and response are discussed in SWPPP. No documentation in SWPPP of any spill event occurring.				
Erosion and Sediment Controls	(e.g., stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, flow velocity dissipation devices at discharge locations and within outfall channels)				
	Site is open to rainwater, area below culverts is stabilized with asphalt.				
Management of Runoff	(e.g., divert, infiltrate, reuse, contain, or otherwise reduce storm water runoff, to minimize pollutants in discharges)				
	Retention pond in place to collect rainfall runoff from north portion of site. (Photo 2) South side does not have berm in place.				
Salt Storage Piles	(e.g., enclose or cover piles appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile)				
	N/A				

SWPPP Implementatio	n				
Waste, Garbage and Floatable Debris	(e.g., keep exposed areas free of such materials or by intercepting them before they are discharged)				
	Junk and waste piles on south side of site in unbermed area needs to be disposed of or secured. (photo 3)				
	Control Measure Maintenance log indicated uncovered trash bins were replaced with covered bins in September 2012 and the grit chamber bin was replaced with a covered bin in October 2012(photo 1).				
Evidence of non- storm water discharges					
	Reuse water was discharging from a pipe for a meter replacement, but was all contained by the retention pond(photo 2).				
Dust Generation and Vehicle Tracking of Industrial Materials	(minimize generation of dust and off-site tracking of raw, final, or waste materials)				
	Maintenance log indicated drying beds are checked for tracked materials once a week and cleaned as needed.				

NMED/SWQB Official Photograph Log Photo # 1					
Photographer: J. Foote	Date: 1/19/2017				
City/County: Silver City, Grant Co.	State: New Mexico				
Location: Silver City WWTP					
Subject: New covered waste container at headworks					



	NMED/SWQB Official Photograph Log Photo # 2					
Photographer: J. Foote						
City/County: Silver City, Grant Co.	City/County: Silver City, Grant Co. State: New Mexico					
Location: Silver City WWTP						
Subject: Berm and retention pond on North east side of facility. Water is from potable reuse line repair.						



NMED/SWQB Official Photograph Log Photo # 3					
Photographer: J. Foote	Date: 1/19/2017				
City/County: Silver City, Grant Co.		State: New Mexico			
Location: Silver City WWTP					
Subject: Debris storage piles, southeast side of facility with no berm, drains by sheet flow with some water retained in puddles.					



NMED/SWQB Official Photograph Log Photo # 4					
Photographer: J. Foote					
City/County: Silver City, Grant Co. State: New Mexico					
Location: Silver City WWTP					
Subject: sludge overtopped sludge bed wall.					



NMED/SWQB Official Photograph Log Photo # 5		
Photographer: J. Foote	Date: 1/19/2017	
City/County: Silver City, Grant Co.		State: New Mexico
Location: Silver City WWTP		•
Subject: Possible diesel UST with stain	ng on the gravel inside curb	



#### NMED/SWQB Official Photograph Log Photo # 6

Photographer: J. Foote Date: 1/19/2017

City/County: Silver City, Grant Co. State: New Mexico

Location: Silver City WWTP

Subject: stabilized septage receiving area, hose outside of containment could allow septage onto the ground





# UTILITIES DEPARTMENT 1211 N. HUDSON STREET

## OF SILVER CITY

BOX 1188, SILVER CITY, NEW MEXICO 88062 • (575) 534-6365 • FAX (575) 534-6391

March 2, 2017

SURFACE WATER QUALITY BUREAU

David Long, NPDES Enforcement Coordinator Environmental Protection Agency, Region 6 NPDES Enforcement Branch (6EN-WM) 1445 Ross Avenue, Suite 1200 Dallas, TX 75202-2733

Re: Response to NPDES Compliance Evaluation Inspection Letter Dated Feb. 21, 2017; Silver City Waste Water Treatment Facility, MSGP, SIC 4952, NPDES Compliance Evaluation Inspection, NM0020109, January 19, 2017

Dear Mr. Long:

On January 17, 2017, Jennifer Foote from the NMED Surface Water Quality Bureau conducted an MSGP/NPDES Compliance Evaluation Inspection on behalf of the EPA. A Compliance Evaluation Inspection letter and a copy of the inspection report was provided to the Town of Silver City and in the letter it encouraged the Town of Silver City to provide EPA and NMED written notification of the Town's modifications and compliance schedules. As a result, the Town of Silver City is hereby providing a written response to the inspection report which will address issues noted within the inspection report.

In the report, it was noted that the Town of Silver City had not renewed its MSGP permit, however, the Town of Silver City had submitted for permit renewal in 2015 but had not performed the necessary action to activate the new permit. Since the inspection, the Town of Silver City has finalized the permit and will begin reporting under the new permit. Also, as part of the permit renewal, the Town of Silver City submitted an updated SWPP to coincide with the new permit.

Multiple reference were made regarding the failure to install a berm to control runoff. The Town of Silver City will have the berm installed following completion of an engineered grading and drainage plan.

The Town of Silver City will also work on other issues noted such as proper signatory on inspections, performance of quarterly inspections, documentation of runoff events, etc.

Should you have any questions regarding the Town of Silver City's response to the inspection report, please contact me directly at (575)534-6355 so that I may be of further assistance.

Your cooperation is appreciated.

Sincerely,

Robert M. Esqueda **Utilities Director** 

Rollin. Egg. L

cc: Alex Brown, Town Manager

Program Manager, NMED, Surface Water Quality Bureau, Point Source Regulation Section File